



October 13, 2021

VIA ECF

Hon. Lorna G. Schofield
U.S. District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

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Re: Hughes v. Jeffrey Beers International LLC et al
Case No.: 21-cv-2974 (LGS)

Dear Judge Schofield:

We represent Defendants and write jointly with Plaintiff's counsel to provide an update regarding the status of the settlement in this matter. The parties have exchanged drafts of a settlement agreement, which includes an intellectual property license that the parties have negotiated over the past few weeks. Now that the terms of the license have been agreed upon, Plaintiff has twenty-one (21) days to consider the agreement per New York law and, assuming she does not revoke her signature, Defendants have fourteen (14) days after the expiration of the 21-day revocation period to issue payment. Accordingly, the parties anticipate consummating settlement and finalizing payment by the week of November 22, 2021 and will file a stipulation of dismissal once settlement has been finalized. Given these circumstances, we ask that the thirty (30) day deadline provided for in the Court's Order dated September 17, 2021 be extended for an additional forty-five (45) days to provide sufficient time for the Parties to consummate the Settlement Agreement.

Respectfully submitted,

/s/ Nandini Rao

Nandini Rao

cc (via ECF): Ralph Dawson, Esq.
Jesse Rose, Esq.

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